



U.S. DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
NATIONAL WEATHER SERVICE
1325 East-West Highway
Silver Spring, Maryland 20910-3283

Marlene H. Dortch, Secretary
Office of the Secretary
Federal Communications Commission
445 12th Street, S.W.
TW-A325
Washington, D.C. 20554

AUG 14 2011

Re: *In the Matter of Review of the Emergency Alert System*
EB Docket No. 04-296

Dear Ms. Dortch:

The National Weather Service (NWS) welcomes the addition of Common Alerting Protocol (CAP) to the Emergency Alert System (EAS) described in Federal Communications Commission Rulemaking proceedings. The EAS implementation of CAP will improve the overall performance and effectiveness of the EAS and it also incorporates Specific Area Message Encoding (SAME) Event Codes and Locations or geocodes through inclusion of the CAP Integrated Public Alert and Warning System (IPAWS) Profile.

The NWS requests changes to the Part 11 EAS Rules as described in the following paragraphs.

1. Change in Part 11 rules, Subpart B, Section 11.31(f), Offshore (Marine Areas).
The NWS has changed the end point from Bonita Beach, FL to Ocean Reef, FL in the titles of the marine areas for the West North Atlantic and Gulf of Mexico. Corresponding titles (or Area descriptions) in Part 11 rules, Subpart B, Section 11.31(f), Offshore (Marine Areas), should be changed to be consistent with those in use by the NWS. Specifically, the NWS requests the old end point, Bonita Beach, FL, be changed to the new end point, Ocean Reef, FL so the titles appear as:

FIPS# 75: Western North Atlantic Ocean, and along U.S. East Coast, south of Currituck Beach Light, N.C., following the coastline to Ocean Reef, FL., including the Caribbean.

FIPS # 77: Gulf of Mexico, and along the U.S. Gulf Coast from the Mexican border to Ocean Reef, FL.

2. Add a new Activation Event Code to Part 11 rules, Subpart B, Section 11.31(e), Event Codes.

The NWS requests the addition of a new "State and Local" Event Code to the presently authorized code listing. The NWS recommended Nature of Activation is "Extreme Wind Warning" (EWW). The NWS recommended Event Code is "EWW." NWS forecasters



issue short duration Extreme Wind Warning/EGW products to provide the public with advance notice of the onset of extreme sustained surface winds (greater than or equal to 115 miles per hour) of a major hurricane (category 3 or higher), usually associated with the eyewall of a hurricane. Extreme Wind Warnings inform the public of the need to take immediate shelter in an interior portion of a well-built structure due to the onset of extreme tropical cyclone winds.

The NWS EGW public warning product became operational for the 2007 hurricane season but the NOAA Weather Radio (NWR) SAME broadcast of EGW has been pending. Broadcasters are reluctant to add and relay the new Event Code via the EAS, fearing FCC adverse action without addition of the new EGW Event Code to the Part 11 list of Event Codes. A complete explanation including a needs statement, benefits and impact, and user feedback is in the enclosure.

The NWS requests the above changes be made as soon as possible but not later than February 1, 2012, to allow time for preparations for the Hurricane Season beginning June 1, 2012, in the Atlantic, Caribbean Sea and Gulf of Mexico. Preparations include adding the new Event Code to the NWS warning message, CAP and NWR audio message production; training; outreach to community decision makers, emergency managers, and broadcasters; and implementation of the Event Code change by broadcasters.

Mr. Herbert White in the NWS Headquarters Office of Climate, Water, and Weather Services will be the lead staff member in these matters. He can be reached via email at Herbert.White@noaa.gov or by telephone at (301) 713-0090, extension 146.

Respectfully,



David B. Caldwell
Director, Office of Climate, Water, and
Weather Services

Enclosure

Request to the FCC to Add a New EAS Event Code For Extreme Wind Warning

The National Weather Service (NWS) requests the addition of a new "State and Local" Event Code to the presently authorized code listing in Part 11 EAS rules, Subpart B, Section 11.31(e), Event Codes. The NWS recommended Nature of Activation is Extreme Wind Warning. The NWS recommended Event Code is EWW. NWS forecasters issue short duration Extreme Wind Warning (EWW) products to provide the public with advance notice of the onset of extreme sustained surface winds (greater than or equal to 115 miles per hour) of a major landfalling hurricane (category 3 or higher on the Saffir-Simpson Hurricane Wind Scale), usually associated with the eyewall of a hurricane. Other use could include non-tropical events in which similar extreme sustained wind speeds are expected. Extreme Wind Warnings inform the public of the need to take immediate shelter in an interior portion of a well-built structure due to the onset of extremely strong winds.

The NWS EWW public warning product became operational for the 2007 hurricane season but the NOAA Weather Radio (NWR) Specific Area Message Encoding (SAME) broadcast of EWW has been pending. Broadcasters are reluctant to add and relay the new Event Code via the EAS, fearing FCC adverse action without addition of the new EWW Event Code to the Part 11 list of Event Codes.

Need for a new EAS Event Code

The need for an EWW product emerged in 2004 when Hurricane Charley moved across the Florida peninsula and over the Orlando metropolitan area. The initial extreme wind warnings issued in 2004 used the existing NWS product "Tornado Warning" and the accompanying EAS Event Code of TOR, because it carried very high visibility by EAS stations and media. The body of the product carried a message emphasizing extremely destructive winds associated with the core of the hurricane.

However, to some users the use of a Tornado Warning for winds associated with a hurricane was confusing. The NWS believes EAS implementation of a new EAS Event Code is necessary to reach the public and elicit an immediate public response in advance of the strongest core of sustained winds associated with a category 3 or stronger hurricane. No other existing EAS Event Code is adequate or acceptable to activate EAS for an Extreme Wind Warning.

Benefits and Impact

The dangerous wind conditions for which an Extreme Wind Warning is issued are rare but bring great potential for loss of life. It is estimated 80% of people living along our hurricane-prone coastlines have never experienced the core of a category 3 hurricane. People inland especially do not expect such strong winds and typically do not prepare properly. The EWW EAS Event Code will allow NWS and broadcasters to improve public alerting of these destructive, life-threatening winds.

User Feedback

The concept and usefulness of an Extreme Wind Warning has been validated by NWS users.

WFO New Orleans, LA. We need a short fuse product for this type of event and there is merit in putting out a warning to alert people to stay in their safe rooms/shelters.

WFO Mobile, AL. We are much in favor of some sort of warning for sustained Category 3 or higher eyewall winds.

In Oseola County, FL, former Emergency Management Director Cheryl Grabowski said the use of the Tornado Warning for extreme winds from Hurricane Charley was “fantastic. They (*WFO Melbourne, FL*) gave me almost to the minute locations, and were really helpful.”

In Orlando, FL, Dean O’Neal, WPOZ radio, stated, “Stroke of genius for getting into EAS.” (via the TOR product)

Glenn Richards, Chief Meteorologist at WOFL, FOX TV 35 in Orlando, stated “The Eyewall Tornado Warning was awesome. I did a double take for a moment. This told me to treat it differently than other 100 mph wind gusts through the area.”

Josh Johnson, meteorologist at WTOK-TV 11 in Meridian, MS, stated issuing Extreme Wind Warnings to warn the public about the extremely dangerous winds in the eyewall of major landfalling hurricanes is excellent.

David Hartman, Chief Meteorologist from WAPT-TV 16 in Jackson, MS, stated he understood the Extreme Wind Warnings and thought they worked well.

Tony Mastro, Meteorologist with WJTV-TV 12 in Jackson, MS, said he also understood the warning and thought they were appropriate for the situation. However, he believes that there could be a problem educating the public on these warnings (*NWS recognizes the need for education for any new product*).

The Homeland Security Department used the warnings to reinforce the idea with the public that it was time to immediately take protective action.

A note on lack of recent user feedback

The Extreme Wind Warning (EWW) became a new operational NWS product for the 2007 hurricane season. However, for the four hurricane seasons spanning 2007-2010, there were no landfalling hurricanes with winds reaching the issuance criterion for the EWW. Thus, we have no recent feedback.

Improved Services to the Nation

Advances in science and observational tools, including Doppler radar, now afford NWS meteorologists the ability to accurately issue these types of warnings. The NWS believes

the new Extreme Wind Warning, supplementing existing NWS hurricane products, will present a full spectrum of warnings for hurricane landfalls and save lives.

Example: Extreme Wind Warning (EWW)

WFUS52 KTBW 131938
EWWTBW
FLC015-071-132100-
/O.NEW.KTBW.EW.W.0013.040813T1938Z-040813T2100Z/

BULLETIN - EAS ACTIVATION REQUESTED
EXTREME WIND WARNING
NATIONAL WEATHER SERVICE TAMPA BAY - RUSKIN FL
338 PM EDT FRI AUG 13 2004

THE NATIONAL WEATHER SERVICE IN RUSKIN HAS ISSUED AN

* EXTREME WIND WARNING FOR THE ONSET OF SUSTAINED WINDS OF 115
MPH OR GREATER FOR...

CHARLOTTE COUNTY IN SOUTHWEST FLORIDA
LEE COUNTY IN SOUTHWEST FLORIDA

* UNTIL 500 PM EDT

* AT 335 PM EDT...SURFACE OBSERVATIONS AND NATIONAL WEATHER
SERVICE DOPPLER RADAR INDICATED EXTREME WINDS...ASSOCIATED
WITH THE EYEWALL OF HURRICANE CHARLEY...WERE MOVING
ONSHORE NEAR NORTH CAPTIVA ISLAND. SUSTAINED WINDS IN EXCESS
OF 140 MPH...CAPABLE OF PRODUCING WIDESPREAD DESTRUCTION...CAN
BE EXPECTED AS THE EYEWALL PASSES OVERHEAD. MOVEMENT WAS
NORTH NORTHEAST AT 20 MPH.

* THESE EXTREME WINDS WILL AFFECT...

ST. JAMES CITY BY 345 PM
BOKEELIA BY 350 PM
PUNTA GORDA BY 400 PM

THIS IS A DANGEROUS STORM! MOVE INTO AN INTERIOR ROOM AWAY
FROM WINDOWS AND OUTER WALLS. COVER YOUR HEAD AND BODY
WITH PILLOWS OR BLANKETS.

LAT...LON 2672 8226 2644 8213 2702 8174 2702 8207
TIME...MOT...LOC 1935 200DEG 17KT 2665 8210

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